

**C L I F F O R D**  
**C H A N C E**

**CLIFFORD CHANCE US LLP**

31 WEST 52ND STREET  
NEW YORK, NY 10019-6131

TEL +1 212 878 8000  
FAX +1 212 878 8375

[www.cliffordchance.com](http://www.cliffordchance.com)

**By ECF**

Hon. John G. Koeltl  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

Direct Dial: +1 212 878 8205  
E-mail: [jeff.butler@cliffordchance.com](mailto:jeff.butler@cliffordchance.com)

April 12, 2024

Re: *Kingdom of Belgium, Federal Public Service Finance Pension Plan Litigation*,  
Lead Case: No. 21 Civ. 6392 (JGK)  
Member Cases: Nos. 21 Civ. 6392 (JGK), 21 Civ. 6399 (JGK), 21 Civ. 6402 (JGK),  
21 Civ. 6404 (JGK), 21 Civ. 6405 (JGK), 21 Civ. 6407 (JGK),  
21 Civ. 6408 (JGK)

Dear Judge Koeltl:

We write pursuant to Section 1.E of Your Honor’s Individual Practices, and with the consent of certain of the parties, to request extensions of various deadlines set forth in the Rule 26(f) Report approved by the Court on August 7, 2023 (the “August 7 Order”) and extended by the Court on January 4, 2024 (the “January 4 Order”).

In the August 7 Order, the Court approved an initial expedited discovery schedule relating to the statute of limitations defense, which was then modified in the January 4 Order. Under the modified schedule, the “Limited Rule 30(b)(6) Deposition of Plaintiff” has a deadline of April 15, 2024. Due to various circumstances, the parties have been unable to schedule this deposition within the allotted time.

The parties, other than Batavia Capital Pension Plan, Calypso Investments Pension Plan, Richard Markowitz, and RJM Capital Pension Plan, have now agreed to the following revised schedule, which extends all remaining deadlines in the January 4 Order by 60 days:

Description	Proposed Deadline
Limited Rule 30(b)(6) Deposition of Plaintiff (Statute of Limitations Issues Only)	June 15, 2024

**C L I F F O R D****CLIFFORD CHANCE US LLP****C H A N C E**

<b>Description</b>	<b>Proposed Deadline</b>
Limited Consolidated Summary Judgment Motion on Statute of Limitations Issues	July 15, 2024
Completion of General Document Production (by Parties)	August 9, 2024
Contention Interrogatories pursuant to Local Civil Rule 33.3 may be served	September 9, 2024
Meet-and-confer on Topics for Expert Discovery	December 23, 2024
Fact Discovery Cut-Off	January 24, 2025
Expert Reports by Party with Burden	March 24, 2025
Rebuttal Expert Reports	April 25, 2025
Expert Discovery Cut-Off	June 17, 2025
Dispositive Motions	July 15, 2025
Pretrial Order	45 days from date of decision on any dispositive motion (or July 27, 2025, if there is no such motion)

The parties jointly request that the Court approve these modifications to the schedule. This is the second request for extensions of the deadlines in the August 7 Order.

Respectfully submitted,

*s/ Jeff E. Butler*

Jeff E. Butler